BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF
RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MAYO
TO INTERROGATORIES OF DAVID B. POPKIN,
REDIRECTED FORM THE POSTAL SERVICE
(DBP/USPS-105, 113)

The United States Postal Service hereby moves for late acceptance of the responses of witness Mayo to the following interrogatories of David B. Popkin: DBP/USPS-105 and 113, filed on December 18, 2001, and redirected from the Postal Service. These responses are 3 business days late because of interruptions related to the holiday season, the need to coordinate responses with field personnel, and the witness' other workload during this period.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

David H. Rubin

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-2986; Fax -6187 January 7, 2002

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

David H. Rubin

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 January 7, 2002